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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**ARGO TURBOSERVE CORPORATION,**

**Plaintiff,**

**versus**

**DEAN ANGELLE AND DENISE ANGELLE,**

**Defendants.**

**CASE NO. 07 CIV 8410 (RMB)  
(GWG)**

**ECF**

**DECLARATION OF ERIC  
MICHAEL LIDDICK IN  
SUPPORT OF DEFENDANTS'  
MOTIONS TO DISMISS  
PLAINTIFF'S AMENDED  
COMPLAINT AND  
ALTERNATIVELY FOR STAY**

**ERIC MICHAEL LIDDICK** declares as follows:

1. I am a member of Jones, Walker, Waechter, Poitevent, Carrère & Denègre, L.L.P., attorneys for Defendants Dean Angelle and Denise Angelle.
2. I submit this declaration in support of Defendants' Motions to Dismiss Plaintiff's Amended Complaint and Alternately for Stay.
3. The following documents are attached hereto and made a part of this motion:

**Exhibit “1”** – Stock Purchase Agreement dated February 1, 2006 by and among Argo Turboserve Corporation, D&D Pipe and Rentals, Inc., and Dean and Denise Angelle.

**Exhibit “2”** – Lease Agreement dated March 3, 2006 executed by and between Angelle Properties, L.L.C. and D&D Pipe and Rentals, Inc.

**Exhibit “3a”** – Verified Petition for Injunction Relief and Issuance of TRO and Damages for Breach of Lease Agreement, filed in *Angelle Properties, L.L.C. v. D&D Pipe and Rentals, Inc.*, No. 2007-5870, Division “K”, 15th Judicial District Court for the Parish of Lafayette.

**Exhibit “3b”** – Joint Motion to Hold Accounts in Escrow, filed in *Angelle Properties, L.L.C. v. D&D Pipe and Rentals, Inc.*, No. 2007-5870, Division “K”, 15th Judicial District Court for the Parish of Lafayette.

**Exhibit “3c”** – First Amended and Restated Petition for Damages for Breach, filed in *Angelle Properties, L.L.C. v. D&D Pipe and Rentals, Inc.*, No. 2007-5870, Division “K”, 15th Judicial District Court for the Parish of Lafayette.

**Exhibit “4”** – Promissory Note dated February 1, 2006 by D&D Pipe and Rentals, Inc. in favor of Dean Angelle and Denise Angelle.

**Exhibit “5”** – Guaranty dated February 1, 2006 by Argo Turboserve Corporation in favor of Dean Angelle and Denise Angelle.

**Exhibit “6”** – Executive Employment Agreement dated March 3, 2006 entered into by and between D&D Pipe and Rentals, Inc. and Dean Angelle.

**Exhibit “7a”** – Notice of Resignation dated April 2, 2007 from Dean Angelle to Clyde Keaton.

**Exhibit “7b”** – Acceptance of Resignation dated April 11, 2007 from Clyde Keaton to Dean Angelle.

**Exhibit “8”** – Notice of Indemnification dated August 14, 2007 from Steven J. Cohen, Esq. to Dean Angelle and Denise Angelle.

**Exhibit “9”** – September 5, 2007 Letter from Margaret D. Swords, Esq. to Steven J. Cohen, Esq.

**Exhibit “10”** – September 12, 2007 Letter from Carl D. Rosenblum, Esq. to Steven J. Cohen, Esq.

**Exhibit “11”** – September 21, 2007 Letter from Steven J. Cohen, Esq. to Carl D. Rosenblum, Esq.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New Orleans, Louisiana, this 3rd day of March, 2008.

/s/ Eric Michael Liddick

Eric Michael Liddick (LA Bar No. 31237)  
(Admitted *Pro Hac Vice*)